

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-  
FLW-LHG  
  
MDL No. 2738**

***THIS DOCUMENT RELATES TO ALL CASES***

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**MOTION AND NOTICE OF MOTION OF THE PLAINTIFFS' STEERING  
COMMITTEE TO EXCLUDE THE OPINIONS OF  
DRS. NEEL, SHIH, BOYD AND BIRRER**

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**PLEASE TAKE NOTICE,** that pursuant to Fed. R. Evid. 104(a), 403, 702, and 703, the Plaintiffs' Steering Committee ("PSC") hereby moves to exclude the opinions and testimony of Drs. Neel, Shih, Boyd, and Birrer.

For the reasons set forth more fully in the following accompanying materials, the Court should grant the PSC's motion:

- The Plaintiffs' Steering Committee's Omnibus Brief Regarding Daubert Legal Standard and Scientific Principles for Assessing General Causation;
- The Plaintiffs' Steering Committee's Memorandum of Law in Support of Its Motion to Exclude the Expert Opinions of Defendants' Molecular Biologists Drs. Neel, Shih, Boyd, and Birrer; and,
- Certification of Counsel with attached Exhibits.

A proposed form of order is attached.

Dated: May 7, 2019

Respectfully submitted,

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